

CBW:nmb

United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

RANDALL DEAN JONES

**CRIMINAL COMPLAINT**Case Number: 12-mj-62  
(mkk)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 18, 2011, in Beltrami County, in the State and District of Minnesota, defendant(s) an Indian, did assault Brian Lee Johnson, also an Indian, with a dangerous weapon, to-wit: a knife, with intent to do bodily harm without just cause or excuse, in violation of Title 18, United States Code, Sections 113(a)(3), 1151 and 1153(a).

in violation of Title 18, United States Code, Section(s) 113(a)(3), 1151 and 1153(a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Feb. 23, 2012  
Date

Mary Kay Klein  
UNITED STATES MAGISTRATE JUDGE

Name &amp; Title of Judicial Officer

*C. E. Bonser*

Signature of Complainant  
Charles E. Bonser  
FBI

Bemidji, MN  
City and State

*Mary Kay Klein*  
Signature of Judicial Officer

SCANNED

FEB 24 2012

U.S. DISTRICT COURT ST. PAUL

1 STATE OF MINNESOTA )

2 )

3 COUNTY OF BELTRAMI ) ss. AFFIDAVIT OF CHARLES EDWARD BONSER

4 )

5 )

6

7 1. Your affiant, Charles Edward Bonser, being duly sworn,  
8 does depose and state as follows:

9 2. I am a Special Agent (SA) of the Federal Bureau of  
10 Investigation (FBI). I have been a Special Agent of  
11 the FBI since December 2010. I am currently assigned  
12 to the Bemidji, Minnesota Resident Agency of the FBI  
13 with the primary responsibility of investigating  
14 violent crimes that occur on the Red Lake Indian  
15 Reservation. The information contained in this  
16 affidavit is based on my knowledge and on the  
17 reporting and knowledge of other law enforcement  
18 officers involved in this investigation.

19 3. On June 18, 2011, The Red Lake Police Department  
20 (RLPD) responded to an assault with a dangerous  
21 weapon. The victim, Brian Lee Johnson, date of birth  
22 XX/XX/1983 was transported to the hospital with  
23 several stab wounds. Due to the extent of his  
24 injuries, he was transported to Sanford Fargo  
25 Hospital.

26 4. On June 23, 2011, RLPD Criminal Investigator Leonard  
27 Red Cloud interviewed Brian Johnson. Johnson said  
28 that while at the Alvin Johnson residence on the Red  
29 Lake Indian Reservation, he was called out to the  
30 roadway. Johnson recognized Randall Dean Jones, date  
31 of birth XX/XX/1991.

- 1 5. Johnson was attacked and fell to the ground. Johnson  
2 said that Jones stabbed him several times.
- 3 6. On January 20, 2012, at his request, Jones was  
4 interviewed by SA Charles Bonser of the Federal Bureau  
5 of Investigation. Jones admitted that he punched  
6 Brian Johnson and then stabbed him several times  
7 causing him to fall to the ground. Jones admitted  
8 that he stabbed Johnson again as he rolled on the  
9 ground. Jones said he stabbed Johnson because Johnson  
10 is in an opposing gang.
- 11 7. I know that the roadway near the Alvin Johnson  
12 residence is located within the exterior boundaries of  
13 the Red Lake Indian Reservation.
- 14 8. I know that Randall Dean Jones is an enrolled member  
15 of the Red Lake Band of Chippewa Indians.
- 16 9. I know that Brian Lee Johnson is an enrolled member of  
17 the Red Lake Band of Chippewa Indians.
- 18 10. I have not included every fact known to me concerning  
19 this investigation. I have set forth only the facts  
20 necessary to establish probable cause that a federal  
21 crime has been committed.
- 22 11. Based upon the above information, I believe that there  
23 is probable cause to conclude that on June 18, 2011,  
24 within the exterior boundaries of the Red Lake Indian  
25 Reservation, Minnesota, a location within the special  
26 territorial jurisdiction of the United States, Randall  
27 Dean Jones, and Indian male, date of birth XX/XX/1991,  
28 did knowingly assault Brian Lee Johnson, also an  
29 Indian male, date of birth XX/XX/1983, in violation of  
30 Title 18, United States Code, Section 113(a)(3),  
31 113(a)(6), 1151, and 1153.
- 32 12. Further your affiant sayeth not.

Charles Edward Bonser

Charles Edward Bonser

Special Agent

Federal Bureau of Investigation

Bemidji, Minnesota

Subscribed and sworn to before me this 23<sup>rd</sup> day of February,  
2012.

Mary Kay Klein

U.S. Magistrate Judge